

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GREAT CREATION SHIPPING, LTD. AND	§	
SINOTRANS SHIP MANAGEMENT LTD.	§	
	§	
Plaintiffs,	§	
	§	
v.	§	C.A. NO. 4:10-cv-01166
	§	(Admiralty)
M/V ZOOUZOU, <i>in rem</i> , her engines, tackle,	§	
apparel, etc.,	§	
	§	
Defendant.	§	

DORAN NAVIGATION, INC.'S RULE 26(a) INITIAL DISCLOSURES

Claimant Doran Navigation, Inc. ("Doran") makes the following initial disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure:

(i) The name, and if known, address and telephone numbers of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subject of the information:

**Captain Hong Zing Wu
Chief Engineer A Lu Luo
Chief Officer Jian Wen Zhang
Second Officer Jian Peng Wang
Duty A/B Ming Jie Quin
Duty A/B De Wen Yan
c/o Sinotrans Ship Management Limited
21st Floor, Great Eagle Centre
23 Harbour Road
Wan Chai, Hong Kong, China**

These officers and crew members of the m/v Great Creation have knowledge or information regarding that vessel's procedures, mooring arrangements, events during the stay at the Agrifos Terminal, and the events surrounding the alleged surging incident, as well as other liability and damages issues.

**Representatives of Sinotrans Ship Management Limited
21st Floor, Great Eagle Centre
23 Harbour Road
Wan Chai, Hong Kong, China**

Sinotrans is the manager of the m/v Great Creation. Its representatives should have knowledge and information regarding the training and qualifications of that vessel's crew members and practices and procedures carried out onboard.

**Grieg International II (Owner)
Grieg Shipping Group AS
Grieg – Gaarden
C. Sundts Gate 17-19,
5004 Bergen Norway**

These companies are, respectively, the owner and manager of the bulk carrier Str Kinn. This vessel passed by the m/v Great Creation's berth alongside the Agrifos Terminal at approximately 0220 hours on April 9, 2010.

**Brian Warman, Operations Manager
Fillette Green Shipping Services (USA) Corp.
12605 East Freeway, Suite 540
Houston, Texas 77015
Telephone: (713) 453-5895**

Local agent for m/v Great Creation. Mr. Warman provided warnings to the m/v Great Creation officers regarding history of mooring problems at the Agrifos Terminal and the need to pay extra attention to mooring lines while at that berth. Mr. Warman should also have knowledge and information regarding the ship's operations and events during that ship's stay at Agrifos.

**Great Creation Shipping Ltd.
21st Floor, Great Eagle Centre
23 Harbour Road
Wan Chi, Hong Kong, China**

This company is the owner of the m/v Great Creation.

**Lt. Scott Mercurio
Steven Stokeley
c/o U.S. Coast Guard
Sector Houston – Galveston
9640 Clinton Drive
Houston, TX 77029**

These Coast Guard representatives have been involved in investigations relevant to Plaintiffs' claims in this civil action.

**Doran Navigation Inc.
c/o International Marine Services S.A. (IMS SA)**

**14 Skouze Street
185 36 Piraeus Greece**

This company is the registered owner of the m/t ZouZou.

**Capt. Kumar Sanjiv
Chief Engineer Ankush Manaji Daokhar
Second Officer Anand Sharad Kagal
Third Officer Manoj Gurnani
A/B Subhash Sharada Ranjan Dutta
c/o Navig 8 Ship Management Pte Ltd.
3, Temasek Avenue
No. 25-01 Centennial Tower
Singapore 03910
65-66220088**

These officers and crew members of the m/t ZouZou have knowledge and information regarding that vessel's inbound passage in the Houston Ship Channel on April 9, 2010.

**Eric W. Corgey
c/o James T. Brown
Legge Farrow, Kimmitt, McGrath & Brown, L.L.P.
6363 Woodway Drive, Suite 400
Houston, Texas 77057
Telephone: (713) 917-0888**

Capt. Corgey was the Houston pilot at the conn of the m/t ZouZou during the inbound passage in the Houston Ship Channel on April 9, 2010.

**Erich N. Engelbrecht
4518 Avery Hollow
League City, Texas
Telephone: (409) 795-7203**

Mr. Engelbrecht was the Mate of m/t ZouZou's assist tug HADEN II on April 9, 2010.

**Jason Shead
7732 Silver Lure Drive
Humble, Texas 77346
Telephone: (281) 883-2979**

Mr. Shead was Mate of the m/t ZouZou's assist tug ROSEMARY on April 9, 2010.

**Capt. Stef Wozniak
Hamilton Marine Surveyors
119 Pine Shadows Drive
Seabrook, Texas 77586
Telephone: (281) 326-2178**

Capt. Wozniak acted as the m/t ZouZou interests' marine surveyor.

**Marc Fazioli
3D Marine USA, Inc.
12411 Donna Lane
Houston, Texas 77067
Telephone: (281) 444-9495**

Mr. Fazioli reportedly acted as marine surveyor for the time charterer of m/t Great Creation.

**Minas P. Manias
Seafarer Marine
14234 Heather Falls
Houston, Texas 77062
Telephone: (281) 488-3693**

Mr. Manias acted as marine surveyor for the Agrifos Terminal.

**G. P. Singh
Independent Maritime Consulting, Ltd.
1560 West Bay Area Blvd., Suite 270
Friendswood, Texas 77546
Telephone: (281) 480-4620**

Mr. Singh acted as marine surveyor for the m/v Great Creation interests.

Plaintiffs will supplement as discovery continues.

(ii) A copy - or a description by category and location - all documents, electronically sorted information and tangible things that the disclosing party has in its possession, custody or control of the party and may use to support its claims or defenses, unless the use would be solely for impeachment:

- 1. Ship's Particulars;**
- 2. Crewlist;**
- 3. Master's credentials;**
- 4. Deck Log Book;**
- 5. Fathometer trace;**
- 6. Engine Room Log Book;**

7. **Bell Book;**
8. **Bridge Bell Book;**
9. **Pilot Card;**
10. **Master/Pilot exchange;**
11. **Passage Plan;**
12. **Relevant Safety Management System information;**
13. **Certificate of Class;**
14. **IOPP Certificate;**
15. **Loadline Certificate;**
16. **Cargo Ship Safety Equipment Certificate;**
17. **Cargo Ship Safety Construction Certificate;**
18. **Cargo Ship Safety Radio Certificate;**
19. **International Tonnage Certificate;**
20. **Port Vision Data;**
21. **Surveyor's reports;**
22. **G&H Towing Reports/Statements;**
23. **Chart;**
24. **USCG VTS and Unsafe Mooring Log; and**
25. **Pilot's statement.**

These documents have already been provided to Plaintiffs' lawyer.

(iii) A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

Doran Navigation, Inc. is not presently seeking to recover money damages in this civil action.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payment made to satisfy the judgment.

M/t ZouZou is entered for P&I risks with the North of England Protecting & Indemnity Association Limited. A copy of the Club's rules is available for inspection and copying at the offices of the undersigned counsel for Doran at a mutually convenient time.

Respectfully submitted,

By: /s/ David R. Walker

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Attorney in Charge for Claimant
Doran Navigation Company

OF COUNSEL:

ROYSTON, RAYZOR, VICKERY & WILLIAMS, LLP

CERTIFICATE OF SERVICE

I the undersigned, do hereby certify that I forwarded a true and correct copy of the foregoing to the following counsel of record by electronic service, telefax, or certified mail return receipt requested on this 4th day of June, 2009:

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